

**From:** Lamparello, Dawn Monsen  
**To:** [Flanagan, Sarah](#)  
**Subject:** RE: Diamond Alkali - Eden Wood Corporation  
**Date:** Tuesday, October 24, 2017 4:59:34 PM

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Sarah,

In response to your e-mail below, as you may be aware, Eden Wood (Delaware) voluntarily executed the RI/FS AOC and the CPG's confidential organization agreement in 2007. Eden Wood (DE) remained a member of the CPG until 2014, when Eden Wood (DE) withdrew from the CPG citing that it was not the successor to Whippany Paper Board Company, Inc. From 2014 through 2016, the CPG actively tried to negotiate a settlement with Eden Wood and all related and affiliated entities (which, as you note, are part of the same corporate family and located at the same address). CPG members have an obligation to continue to make RI/FS and EPA oversight payments, notwithstanding their withdrawal from the Group. Eden Wood has failed to comply with these obligations. To date, Eden Wood owes the Group over \$500K. After August 2016, the Group has had no substantive communications with Eden Wood or its counsel.

Please let us know if you have any questions or wish to discuss further.

Thanks,  
Dawn

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**From:** Flanagan, Sarah [mailto:[Flanagan.Sarah@epa.gov](mailto:Flanagan.Sarah@epa.gov)]  
**Sent:** Tuesday, October 03, 2017 5:06 PM  
**To:** Lamparello, Dawn Monsen  
**Subject:** Diamond Alkali - Eden Wood Corporation

Dawn – We are taking care of some loose ends and one of those is the recent correspondence from Eden Wood Corporation taking the position that the “Eden Wood Corporation” that received a general notice letter (GNL) and joined the CPG was not the “Eden Wood Corporation” that is the corporate successor to Whippany Paper Board Company, Inc.

While the correspondence is a bit vague on the identity of the actual corporate successor, it appears that the Eden Wood Corporation that is the corporate successor had in 1996 or thereabouts changed its name to Neu Holdings Corporation (NHC), and that NHC and the new Eden Wood Corporation are part of the same corporate family and located at the same address. When EPA issued the GNL, we did not make a clear distinction between NHC (the successor to Eden Wood incorporated in New Jersey) and the Eden Wood incorporated in Delaware. Hence, the confusion.

At any rate, Eden Wood Corporation's counsel, Warren Dean, has requested that EPA remove the company from our list of responsible parties. Before we reach out to Mr. Dean to address his request and ask him to identify the correct corporate successor, I am touching base with you to see if the CPG has had any further dealings with Eden Wood Corporation or Mr. Dean that might shed any light on this issues. Thanks, and look forward to hearing from you.

-Sarah

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